

HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION

NATHEN BARTON,

Plaintiff,

vs.

LEADPOINT INC., RELIANCE FIRST
CAPITAL LLC, LOANDEPOT LLC, GLOBAL
EQUITY FINANCE INC., NATIONWIDE
MUTUAL INSURANCE COMPANY,

Defendants.

Case No.: 3:21-cv-05372-BHS-TLF

**STIPULATION FOR EXTENSION OF
TIME FOR LEADPOINT, INC. AND
RELIANCE FIRST CAPITAL, LLC TO
FILE THEIR MOTION FOR
ATTORNEYS' FEES AND COSTS**

**NOTE ON MOTION CALENDAR:
JANUARY 25, 2022**

STIPULATION

Plaintiff Nathen Barton ("Plaintiff") and Defendants LeadPoint, Inc. ("LeadPoint") and Reliance First Capital, LLC ("Reliance") (collectively the "Parties"), hereby stipulate and agree as follows:¹

WHEREAS, this Court entered an Order and Judgment on January 13, 2022;

¹ Counsel for LeadPoint and Reliance have confirmed that the content of this document is acceptable to Plaintiff and have obtained his authorization to include his electronic signature.

1 WHEREAS, pursuant to Fed. R. Civ. P. 54(d)(2)(B)(i), LeadPoint and Reliance currently
2 have until January 27, 2022 to file a motion seeking attorneys' fees and related nontaxable
3 expenses;

4 WHEREAS, on Friday January 21, 2022, the Parties met and conferred regarding
5 LeadPoint and Reliance's forthcoming motion for attorneys' fees and related nontaxable costs;

6 WHEREAS, the Parties are continuing to meet and confer to discuss potential resolution of
7 the forthcoming motion, and respectfully ask this Court for an extension through and including
8 February 4, 2022 for LeadPoint and Reliance to file their motion for attorneys' fees and related
9 nontaxable costs;

10 WHEREAS, the Parties respectfully submit that good cause exists for the requested
11 extension. If the Parties are able to reach an agreement, the extension would reduce further
12 attorneys' fees and time spent litigating the case and could result in the Court not having to expend
13 resources resolving the motion.

14 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED TO BY THE PARTIES,
15 that LeadPoint and Reliance may have until, and including, February 4, 2022 to file a motion for
16 attorneys' fees and related nontaxable costs.

17 RESPECTFULLY SUBMITTED this 25th day of January, 2022.

18 Dated: January 26, 2022

19 **MINTZ LEVIN COHN FERRIS
GLOVSKY AND POPEO, P.C.**

20 /s/ Esteban Morales
21 Esteban Morales (Admitted *pro hac vice*)

22 /s/ Matthew J. Novian
23 Matthew J. Novian (Admitted *pro hac vice*)

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27 E-mail: emorales@mintz.com;
mjnovian@mintz.com

28 STIPULATION FOR EXTENSION OF TIME TO FILE
MOTION FOR ATTORNEYS' FEES AND COSTS - 2
CASE NO. 2:20-cv-00894-JCC

MINTZ
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LOS ANGELES, CALIFORNIA 90067
(310) 586-3200

**GOLDFARB & HUCK ROTH RIOJAS,
PLLC**

Dated: January 26, 2022

/s/ R. Omar Riojas

R. Omar Riojas, WSBA No. 35400

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Seattle, WA 98104

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Facsimile: (206) 397-3062

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*Attorneys for Defendants LeadPoint, Inc. and
Reliance First Capital, LLC*

/S/ NATHEN BARTON

Dated: January 26, 2022

Nathen Barton

4618 NW 11th Cir

Camas WA 98607

E-mail: FarmersBranch2014@gmail.com

ORDER

Pursuant to the above stipulation, **IT IS SO ORDERED.**

DATED this 26th day of January, 2022.



BENJAMIN H. SETTLE
United States District Judge

Presented by:

MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO, P.C.

/s/ Esteban Morales

Esteban Morales (Admitted *pro hac vice*)

/s/ Matthew J. Novian

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Counsel for Defendants LeadPoint, Inc. and
Reliance First Capital, LLC

STIPULATION FOR EXTENSION OF TIME TO FILE
MOTION FOR ATTORNEYS' FEES AND COSTS - 4
CASE NO. 2:20-cv-00894-JCC

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/S/ NATHEN BARTON

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STIPULATION FOR EXTENSION OF TIME TO FILE
MOTION FOR ATTORNEYS' FEES AND COSTS - 5
CASE NO. 2:20-cv-00894-JCC

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CERTIFICATE OF SERVICE

I hereby certify that, on January 26, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered parties. I also caused the foregoing document to be emailed and sent via First Class Mail to Plaintiff at the following address:

Nathen Barton
4618 NW 11th Cir.
Camas, WA 98607
Email: farmersbranch2014@gmail.com

/s/ Matthew J. Novian
Matthew J. Novian (*admitted pro hac vice*)